

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS,  
INC.,

Defendants.

Civil Action

No. 04-CV-10294-DPW

(additional captions to follow)

**MOTION OF JEFFREY FOSS FOR THE CONSOLIDATION OF ALL  
RELATED ACTIONS, TO BE APPOINTED LEAD PLAINTIFF AND FOR THE  
APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL**

MICHELLE TREBITSCH, Individually And On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10307-DPW

INFORMATION DYNAMICS, LLC, Individually  
And On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10308-DPW

PETER KALTMAN, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10309-DPW

SAMANTHA DEN, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10310-DPW

STEVE L. BAKER, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10333-DPW

MICHAEL KAFFEE, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10345-DPW

RONALD KASSOVER, Individually And On Behalf  
Of The Ronald Kassover IRA And All Others  
Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10329-DPW

RICHARD CURTIS, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10314-DPW

HAIMING HU, Individually And On Behalf of All  
Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10346-DPW

DANIEL WILLIAMS, Individually and on behalf of  
all others similarly situated,

Plaintiff,

-vs.-

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No.:04-cv-10359-DPW

CHARLES STARBUCK, Individually and on behalf  
of all others similarly situated,

Plaintiff,

-vs.-

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action.  
No. 04-CV-10362-DPW

SANUEL HO, Individually and on behalf of all others  
similarly situated,

Plaintiff,

-vs.-

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action.  
No 04-cv-10363-DPW

ROBERT CONTE and MARK RESPLER,  
Individually and on behalf of all others similarly  
situated,

Plaintiffs,

-vs.-

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action.  
No 04-cv-10382-DPW

WHEATON ELECTRICAL SERVICES  
RETIREMENT 401K Profit Sharing Plan, on behalf  
of itself and all others similarly situated,

Plaintiffs,

-vs.-

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No 04-cv-10383

JEFFREY C. RODRIGUES, Individually and on  
behalf of all others similarly situated,

Plaintiffs,

-vs.-

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No 04-cv-10364-DPW

MICHELLE BURK, Derivatively on behalf of Sonus  
Networks, Inc., A Delaware Corporation,

Plaintiffs,

-vs.-

HASSAN AHMED, EDWARD T. ANDERSON,  
PAUL J. FERRI, RUBIN GRUBER, PAUL  
SEVERINO, JOHN MICHAEL O'HARA, EDWARD  
N. HARRIS, STEPHEN NILL, PAUL R. JONES, and  
SONUS NETWORKS, INC., A Delaware  
Corporation,

Defendants.

BRIAN CLARK, Individually and on behalf of all  
others similarly situated,

Plaintiff,

-vs.-

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendant.

Civil Action  
No 04-cv-10384-DPW

Civil Action  
No 04-cv-10454-DPW

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 42(a), and Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 ("PSLRA"), Jeffrey Foss will move the Court for an Order: (i) consolidating the above captioned related actions pursuant to Rule 42(a) and any subsequently filed related cases; (ii) appointing Jeffrey Foss Lead Plaintiff in the consolidated action and any subsequently filed related cases; and (iii) approving his selection of Abbey Gardy, LLP as lead counsel.

This Motion is based on the accompanying Memorandum of Points and Authorities in support thereof, the Declaration of Nancy Kaboolian filed herewith, and all prior pleadings and proceedings herein, and such other written or oral argument as may be permitted by the Court.

DATED: New York, New York  
April 12, 2004

Respectfully submitted,

**LAW OFFICE OF MICHAEL F.  
GERMANO**

By:



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Proposed Lead Counsel